

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ELEV8 BALTIMORE, INC., *et al.*,  
*Plaintiffs,*

v.

CORPORATION FOR NATIONAL AND  
COMMUNITY SERVICE, *operating as*  
AMERICORPS, *et al.*,  
*Defendants.*

Civil Action No. 1:25-cv-01458  
(MJM)

**PLAINTIFFS' MOTION FOR LEAVE TO MEMORANDUM  
OF LAW IN EXCESS OF 30 PAGES**

Plaintiffs, through their counsel, submit this Motion for leave to file a memorandum of law not to exceed 45 pages with respect to their forthcoming motion for preliminary injunction. As good cause, Plaintiffs state:

1. Local Rule 105.3 states that “memoranda in support of a motion . . . shall not exceed thirty (30) pages” unless otherwise ordered by the Court. *See* Loc. R. 105.3.
2. Plaintiffs intend to file a motion for preliminary injunction and request leave to file a supporting memorandum not to exceed 45 pages.
3. On May 5, 2025, Plaintiffs filed a fifty-page Complaint, alleging violations of the Administrative Procedure Act and the Separation of Power/*Ultra Vires* resulting from the dismantling of AmeriCorps. ECF 1.
4. There are eighteen Plaintiffs, including three individual Plaintiffs, fourteen nonprofit organization Plaintiffs, and one local union Plaintiff seeking to vindicate their rights.
5. Because of the scope, breadth, and significance of the constitutional and statutory issues involved, Plaintiffs require more than thirty pages to effectively present their arguments, aid

the Court in its deliberations, and provide Defendants adequate notice regarding the basis of their request for injunctive relief.

6. Plaintiffs' counsel conferred with Joey Borson, DOJ Assistant Director, Civil Division, Programs Branch, who indicated that he had authority to confer on this Motion. Plaintiffs' counsel asked Mr. Borson for Defendants' position on this Motion and indicated that Plaintiffs would also consent to a 15-page extension for Defendants' opposition memorandum. Mr. Borson indicated that Defendants consent to a 15-page extension for both memorandums.

WHEREFORE, Plaintiffs request that this Court grant leave for Plaintiffs to file a memorandum of law in support of their motion not to exceed 45 pages.

Dated: May 16, 2025

/s/ Norman L. Eisen

Norman L. Eisen [Bar No. 09460]  
Tianna J. Mays [Bar No. 21597]  
Pooja Chaudhuri\*  
Sofia Fernandez Gold\*  
Joshua Kolb\*  
**DEMOCRACY DEFENDERS FUND**  
600 Pennsylvania Ave. SE  
Suite 15180  
Washington, DC 20003  
Tel: (202) 594-9958  
Norman@statedemocracydefenders.org  
Tianna@statedemocracydefenders.org  
Pooja@statedemocracydefenders.org  
Sofia@statedemocracydefenders.org  
Joshua@statedemocracydefenders.org  
*Attorneys for All Plaintiffs*

/s/ Elena S. Goldstein

Elena S. Goldstein *admitted pro hac vice*  
Skye Perryman\*  
**DEMOCRACY FORWARD**  
**FOUNDATION**  
P.O. Box 34553  
Washington, D.C. 20043  
Tel: (202) 448-9090  
Fax: (202) 796-4426  
egoldstein@democracyforward.org  
sperryman@democracyforward.org  
*Attorneys for All Plaintiffs*

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell [Bar No. 11863]  
Brenna L. Frey\*  
Isabella M. Oishi\*  
**LOWELL & ASSOCIATES, PLLC**  
1250 H St. NW  
Second Floor  
Washington, D.C. 20005  
Tel: (202) 964-6110  
ALowellpublicoutreach@lowellandassociates.com  
BFrey@lowellandassociates.com  
IOishi@lowellandassociates.com  
*Attorneys for All Plaintiffs*

/s/ Teague P. Paterson

Teague P. Paterson\*  
Matthew S. Blumin\*  
Georgina C. Yeomans\*  
**AMERICAN FEDERATION OF STATE,  
COUNTY, AND MUNICIPAL EMPLOYEES,  
AFL-CIO**  
1625 L. Street NW  
Washington, DC 20036  
Tel: (202) 775-5900  
Fax: (202) 429-1293  
TPaterson@afscme.org  
MBlumin@afscme.org  
GYeomans@afscme.org  
*Attorneys for AMERICORPS EMPLOYEES  
UNION, Local 2027 of the American Federation of  
State, County, and Municipal Employees, AFL-CIO*

\* Application for admission or admission pro hac vice forthcoming

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16 day of May, 2025, a copy of the foregoing Plaintiffs' Motion for Leave to File Brief in Excess of Thirty Pages and all accompanying documents were served electronically on all parties receiving service via CM/ECF in this case.

*/s/ Abbe David Lowell*  
Abbe David Lowell [Bar No. 11863]